

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of a Determination of Special )  
Contemporary Resource Planning Issues to be )  
Addressed by Union Electric Company d/b/a )  
Ameren Missouri in its Next Triennial Compliance )  
Filing or Next Annual Update Report )

**Case No. EO-2026-0037**

**STAFF SUGGESTIONS FOR SPECIAL CONTEMPORARY  
RESOURCE PLANNING ISSUES**

COMES NOW, Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its response to the Commission’s August 8, 2025, *Order Opening A File Regarding Special Contemporary Resource Planning Issues And Offering An Opportunity To File Suggestions*, respectfully states:

Pursuant to commission Rule 20 CSR 4240-22.080(4)(A), Staff Suggests Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) address the following special contemporary issues<sup>1</sup> in its next triennial compliance filing,<sup>2</sup> and as a supplemental filing to its 2025 annual update report:<sup>3</sup>

1. Discrete timeline for permitting processes and construction activities of a nuclear power plant:
  - a. At an existing site;
    - i. Include discussion on transmission capacity needs

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<sup>1</sup> The purpose of the special contemporary issues lists is to ensure that evolving regulatory, economic, financial, environmental, energy, technical, or customer issues are adequately addressed by each utility in its electric resource planning. Each special contemporary issues list will identify new and evolving issues but may also include other issues such as unresolved deficiencies or concerns from the preceding triennial compliance filing. 20 CSR 4240-22.080(4).

<sup>2</sup> Ameren Missouri will file its next triennial compliance filing on, or around, October 1, 2026.

<sup>3</sup> Ameren Missouri will file its next annual update report on, or around, October 1, 2025. This will not allow sufficient time for Ameren Missouri to include Staff’s proposed Special Contemporary Issues. Therefore, Staff recommends Ameren Missouri make a supplemental filing to its next annual update report with Staff’s proposed Special Contemporary Issues by January 1, 2026.

- b. At a greenfield site;
  - c. Tax credit availability and likelihood of being able to achieve current milestones;  
and
  - d. Discussion on systems that track nuclear-based energy attribute certificates/credits  
and discussion on State policies (renewable or clean energy standards) that  
include nuclear-based energy attributes.
2. Large load customers:
- a. Current pipeline of large load customers and which are likely to materialize;
  - b. Discussion on interconnection;
  - c. Potential impact if load does not persist for more than 5, 10, 15 years;
  - d. Ratepayer impact, by class, if current Company cost allocation is utilized; and
  - e. Risk analysis:
    - i. Ratepayer
    - ii. Shareholder
    - iii. Fuel Adjustment Clause (“FAC”) impacts
    - iv. Cost of Renewable Energy Standard (“RES”) compliance
    - v. Changes in load profile or magnitude
3. Capacity:
- a. Updated capacity purchase options;
    - i. Amount
    - ii. Price per kW
4. Battery Energy Storage Systems:
- a. Range of costs;

- b. Operational characteristics; and
  - c. Useful life
- 5. Transmission:
  - a. Zonal transmission import/export limitations; and
  - b. Company/Zonal resource adequacy requirements by season

**WHEREFORE**, Staff suggests Ameren Missouri address in its next triennial compliance filing, and as a supplemental filing to its next annual update report, the special contemporary issues set forth above.

Respectfully Submitted,

**/s/ Tracy D. Johnson**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 11<sup>th</sup> day of September, 2025.

**/s/ Tracy D. Johnson**